

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SHAMIRA CONAWAY,	§	CIVIL ACTION NO. 6:15-cv-00186-WSS
Individually and on Behalf of All Others	§	
Similarly Situated,	§	
	§	
Plaintiff,	§	
	§	
VS.	§	
	§	
WCS SERVICES, LLC,	§	
WARDLAW CLAIMS SERVICE, LLC,	§	
WCCA, INC.,	§	
WARDLAW INSURANCE	§	
SERVICES, LLC,	§	
WARDLAW CLAIMS TRAINING	§	COLLECTIVE ACTION
CENTER, LLC,	§	
WARDLAW AUTO CLAIMS	§	
SOLUTIONS, LLC,	§	
WARDLAW CONSULTING	§	
SERVICES, INC.,	§	
CUSTOM DATA SYSTEMS, INC.,	§	
WILLIAM F. WARDLAW,	§	
MICHAEL WARDLAW,	§	
REBECCA MEADOWS, and	§	
STATE FARM MUTUAL	§	
AUTOMOBILE INSURANCE	§	
COMPANY,	§	
	§	
Defendants.	§	JURY TRIAL DEMANDED

JOINT MOTION TO DISMISS WITH PREJUDICE

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiffs Shamira Conaway, Shamecca Adams, Shienita Woods, Kenneth Gault, Elizabeth Speed, Veronica Thomas, Theresa Walker, Inetta Starks, Danette McCrary, Charleszetta Mingo, Jackie Mitchell, Terry Sims, Marjorie Castro, Marlo Solomon, John Bowman, Tyrone Haynes, and Leticia Gantt (“Plaintiffs”), and Defendants WCS Services, LLC, Wardlaw Claims Service, LLC, WCCA, Inc., Wardlaw Insurance

Services, LLC, Wardlaw Claims Training Center, LLC, Wardlaw Auto Claims Solutions, LLC, Wardlaw Consulting Services, Inc., Custom Data Systems, Inc., William F. Wardlaw, Michael Wardlaw, and Rebecca Meadows (“Wardlaw Defendants”) and State Farm Mutual Automobile Insurance Company (“State Farm,” collectively with Wardlaw Defendants, “Defendants”) file this *Joint Motion to Dismiss with Prejudice* and would respectfully show the following:

DISMISSAL WITH PREJUDICE

Plaintiffs request that this case be dismissed in its entirety as against all Defendants with prejudice to refilling the same and that all costs and attorneys’ fees be paid by the party incurring the same. Defendants join in this motion to dismiss with prejudice.

PRAYER

WHEREFORE, Plaintiffs and Defendants pray that this motion be granted and that this case be dismissed in its entirety with prejudice to refiling the same and that all costs and attorneys’ fees shall be paid by the party incurring the same.

Respectfully submitted,

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ATTORNEYS FOR STATE FARM

**Signed by Permission*

CERTIFICATE OF CONFERENCE

Plaintiffs' counsel and Defendants' counsel have conferred and the parties are in agreement to the requested relief herein.

/s/ Michael A. Starzyk
Michael A. Starzyk

SO ORDERED:

SIGNED this ____ day of January, 2016.

WALTER S. SMITH JR.
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of January, 2016, I served the foregoing on the following in accordance with the Federal Rules of Civil Procedure:

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